

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

PACIFIC INDEMNITY COMPANY )
15 Mountain View Road )
Warren, NJ 07061-1615 )
)
Plaintiff, )
)
)
v. )      C.A. No.: 04-11975-RWZ
ALFRED KEMP, Individually and d/b/a )     BBO# 552588
KEMP PLUMBING )
P.O. Box 1322 )
Pembroke, MA 02359 )
)
and )
)
MARTIN SANDBORG, Individually and d/b/a )
SANDBORG PLUMBING AND HEATING )
13 Liberty Street )
Sandwich, MA 02563, )
)
Defendants. )
)

**DEFENDANT ALFRED KEMP D/B/A KEMP PLUMBING'S  
SECOND SUPPLEMENTAL AND CORRECTED LIST OF  
EXHIBITS TO WHICH THERE ARE NO OBJECTIONS**

Exhibit No.	Description
Kemp 1	Photo - Property
Kemp 2	Photo - 01-Marino6
Kemp 3	Photo - 02-Marino7
Kemp 4	Photo - 03-Marino8
Kemp 5	Photo - 04-Marino9
Kemp 6	Photo - 05-Marino10
Kemp 7	Photo - 06-Marino11
Kemp 8	Photo - 07-Marino12

<b>Exhibit No.</b>	<b>Description</b>
Kemp 9	Photo - 08-Marino13
Kemp 10	Photo - 09-Marino14
Kemp 11	Photo - 10-Marino15
Kemp 12	Photo - 11-Marino16
Kemp 13	Photo - 13-Marino1
Kemp 14	Photo - Fig3 – 220464-R1-24A
Kemp 15	Photo - Fig5 – 220464-R1-22A
Kemp 16	Photo - Fig6 – 2220464-R1-21A
Kemp 17	Photo – Fig7-220464-R1-20A
Kemp 18	Photo - Fire Scene
Kemp 19	Photo - Fire Scene
Kemp 20	Photo - Fire Scene
Kemp 21	Photo - Fire Scene
Kemp 22	Photo - 05790025
Kemp 23	Photo - 05790030
Kemp 24	Photo - 05790024
Kemp 25	Photo - 05780002
Kemp 26	Photo - 05780028
Kemp 34	Photo - Fire Scene
Kemp 35	Photo - Fire Scene
Kemp 36	Photo - Fire Scene
Kemp 37	Photo - Fire Scene
Kemp 38	Photo - 05800024
Kemp 39	Photo - Fire Scene
Kemp 40	Photo - Fire Scene
Kemp 41	Photo - Fire Scene
Kemp 42	Photo - Fire Scene
Kemp 43	Photo - Fire Scene
Kemp 44	Photo - Fire Scene
Kemp 45	Photo - Fire Scene

<b>Exhibit No.</b>	<b>Description</b>
Kemp 46	Photo - Fire Scene
Kemp 47	Photo - 05800025
Kemp 48	Photo - Fire Scene
Kemp 49	Photo - 0580023
Kemp 50	Photo - Fire Scene
Kemp 51	Photo - Fire Scene
Kemp 52	Photo - Fig16 – Fontaine1
Kemp 53	Photo - Fig17 – Fontaine9
Kemp 54	Photo - Fire Scene
Kemp 55	Photo - Fire Scene
Kemp 56	Photo - Fire Scene
Kemp 57	Photo - Fire Scene
Kemp 58	Photo - Fire Scene
Kemp 59	Photo - Fig20 – BN62867_14A_600
Kemp 60	Photo - Fig21 – BN62867_22603_19A_600
Kemp 61	Fig2- plan
Kemp 62	Fig15-plan2
Kemp 63	Photo - Evidence Fig24a BN62867_033
Kemp 64	Photo - Evidence Fig 24b BN62867_034
Kemp 65	Fig25 – BN62867_040
Kemp 66	Fig 26 – AE60392_I2_RC103_028
Kemp 67	Fig35 – AE60392_I2_RE105_008
Kemp 68	Photo - Evidence
Kemp 69	Photo - Evidence Fig34 – AE60392_I2RE105_007
Kemp 70	Photo - Fire Scene
Kemp 71	Photo - Fire Scene
Kemp 72	Photo - Fire Scene
Kemp 73	Photo - Fire Scene
Kemp 74	Photo - Evidence Fig27 – BN62867_003
Kemp 75	Photo - Evidence Fig28 – AE60392_I2_RD104_014

Exhibit No.	Description
Kemp 76	Photo - Evidence Fig29 – AE60392_I2RD104_021
Kemp 77	Photo - Evidence Fig30 – AE60392_I2_RD104032
Kemp 78	Photo - Evidence Fig31 – AE60392_I2_RD104_035
Kemp 79	Photo - Fire Scene
Kemp 80	Photo - 05780014
Kemp 81	Photo - 05780017
Kemp 82	Photo - Fire Scene
Kemp 83	Photo - Fire Scene
Kemp 84	Photo - Fire Scene
Kemp 85	Photo - Fire Scene
Kemp 86	Photo - Fire Scene
Kemp 87	Photo - Fire Scene
Kemp 88	Photo - Fire Scene
Kemp 89	Photo - 05790001
Kemp 90	Photo – Detached valve and connected copper tube (Horn Figure 1)
Kemp 91	Photo – Area under kitchen sink (Horn Figure 2)
Kemp 92	Photo – End of copper tubing (Horn Figure 3)
Kemp 93	Photo – Brass fitting (Horn Figure 4)
Kemp 94	Photo – Joint Section 1 (Horn Figure 5)
Kemp 95	Photo – Joint Section 2 (Horn Figure 6)
Kemp 96	Photo – Joint Section 3 (Horn Figure 7)
Kemp 97	Photo – Joint Section 4 (Horn Figure 8)
Kemp 98	Stereomicroscope Image - Joint Section 1 (Horn Figure 9)
Kemp 99	Backscattered SEM image -Ridge on Joint Section 1 (Horn Figure 10)
Kemp 100	EDS Spectra – Region in box 1 on Exhibit 99 (Horn Figure 11)
Kemp 101	EDS Spectra – Region in box 2 on Exhibit 99 (Horn Figure 12)
Kemp 102	Stereomicroscope Image – Joint Section 1 (Horn Figure 13)
Kemp 103	Stereomicroscope Image – Joint Section 1 at higher magnification (Horn Figure 14)
Kemp 104	Optical Photomicrographs – Copper tube of Joint Section 1 (Horn Figure 15)

Exhibit No.	Description
Kemp 105	Stereomicroscope Image – Joint Section 2 (Horn Figure 16)
Kemp 106	Backscattered SEM Image – Inner surface Joint Section 2 (Horn Figure 17)
Kemp 107	EDS Spectra – Box in Exhibit 106 (Horn Figure 18)
Kemp 108	Optical Photomicrograph – Cross-section inner surface Joint Section 2 (Horn Figure 19)
Kemp 109	Backscattered SEM Image – Cross section of brass fitting in Joint Section 2 (Horn Figure 20)
Kemp 110	EDS Spectra – Arrow #1 on Exhibit 109 (Horn Figure 21)
Kemp 111	EDS Spectra – Arrow #2 on Exhibit 109 (Horn Figure 22)
Kemp 112	EDS Spectra – Arrow #3 on Exhibit 109 (Horn Figure 23)
Kemp 113	Stereomicroscope Images – Joint Section 3 outer surface copper tube (Horn Figure 24)
Kemp 114	Stereomicroscope Images – Joint Section 3 outer surface copper tube (Horn Figure 25)
Kemp 115	Optical Photomicrograph – Cross section Joint Section 3 (Horn Figure 26)
Kemp 116	Stereomicroscope Image – Joint Section 4 (Horn Figure 27)
Kemp 117	Backscattered Electron Image – Joint Section 4 (Horn Figure 28)
Kemp 118	EDS Spectra – Box #1 on Exhibit 117 (Horn Figure 29)
Kemp 119	EDS Spectra – Box #2 on Exhibit 117 (Horn Figure 30)
Kemp 120	Optical Photomicrograph – Cross section brass fitting Joint Section 4 (Horn Figure 31)
Kemp 121	Diagram – Copper-Tin alloy phase diagram (Horn Figure 32)
Kemp 122	Diagram – Lead-Tin phase diagram (Horn Figure 33)
Kemp 123	Schematic – Leaded brass fitting soldered to copper tube (Horn Figure 34)
Kemp 124	Photo – Carriage house electrical panels (Diamond Figure 1)
Kemp 125	Photo – Comparison between circuit breaker handle (Diamond Figure 2)
Kemp 130	Photo – Carriage house kitchen floor debris (Diamond Figure 5)
Kemp 131	Photo – Kitchen cabinet assembly (Diamond Figure 6)
Kemp 132	CV – Timothy Myers, Ph.D.
Kemp 133	CV – Quinn Horn, Ph.D.
Kemp 134	CV – Andrew J. Diamond

Respectfully submitted,  
Defendants,  
Alfred Kemp, Individually and d/b/a Kemp  
Plumbing  
By their attorney,

/s/ Christopher G. Betke  
Christopher G. Betke, BBO# 552588  
Ryan, Coughlin & Betke, LLP  
175 Federal Street  
Boston, MA 02110  
(617) 988-8050

**CERTIFICATE OF SERVICE**

I, Christopher G. Betke, hereby certify that on March 25, 2007, I served a copy of the within document via electronic filing to: Matthew H. Feinburg, Esq., Feinberg & Kamholtz, 125 Summer Street, 6<sup>th</sup> Floor, Boston MA 02110; Daniel Q. Harrington, Esq., Cozen & O'Connor, 1900 Market Street 3<sup>rd</sup> Floor, Philadelphia, PA 19103; Philip Tierney, Esq., Finnegan, Underwood, Ryan & Tierney, 22 Batterymarch Street, Boston, MA 02109.

/s/ Christopher G. Betke  
Christopher G. Betke